

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION**

YVES WANTOU,

Plaintiff,

v.

WAL-MART STORES TEXAS, LLC,

Defendant.

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CIV. A. NO. 5:17-CV-00018-RWS-CMC

PLAINTIFF'S AMENDED TRIAL EXHIBIT LIST

Judge Robert W. Schroeder III			PLAINTIFF'S ATTORNEY <i>[Signature]</i> <i>Pro Se</i> with the assistance of Standby Counsel, J. Randy Roeser	DEFENDANT'S ATTORNEY <i>[Signature]</i> Nancy L. Waters, James N. Zoys
TRIAL DATE (S) October 28, 2019 - _____			COURT REPORTER	COURTROOM DEPUTY
Pl. Ex. No.	Date Offered	Admitted	EXHIBIT	Bates
PX-1	10/28	10/28	Wantou email – harassment (flies) 6/28/2015	Wantou 17
PX-2	10/28	10/28	E-mail from Wantou to Steven Williams 10-1-15	Wantou 20-21 WM-YW 7893-94,
PX-4	11/04	11/04	E-mails, <i>inter alia</i> , from Joedi Graham to Shannon Griggs on 11-4-15 as to Ethics Investigation on Wantou's Discrimination Complaint	WM-YW 005980-82
PX-5	10/28	10/28	Written complaint of hostile work environment and disparate treatment 11-22- 15	Wantou 24-25
PX-7	10/28	10/28	Written Ethics Line Complaint from Wantou: 12-6-15	Wantou 26-29

PX-8	11/5	11/5	Email from Wantou to Kendra Buford re: discrimination complaint 12-22-15	WM/YW 396
PX-9	10/28	10/28	Written Ethics Line Complaint from Wantou; 1-11-16	Wantou 30
PX-10	10/28	10/28	Written Ethics Line Complaint from Wantou; 1-14-16	Wantou 31
PX-11	11/04	11/04	E-mail from Joedi Graham to Shannon Griggs and Kendra Buford on 1-17-16 as to Wantou's Ethics Line Complaint of 1-14-16 and other documents related to said complaint	WM-YW 005884-88
PX-12	10/28	10/28	Written Ethics Line Complaint from Wantou; March 2016	Wantou 35
PX-13	10/28	10/28	E-mail from Wantou to Kendra Buford: Grievance as to annual evaluation, discrimination: 4-13-16	Wantou 41-42
PX-14	10/28	10/28	Written Ethics Line Complaint from Wantou; 4-21-16	Wantou 45
PX-15	10/28	10/28	Written Ethics Line Complaint from Wantou; 4-22-16	Wantou 46
PX-16	10/28	10/28	Complaint from Wantou to Craig Mills and Damon Johnson (4-24-16) re: being harassed and subjected to disparate treatment 4-19-16	Wantou 43-44 5762-63 WM/YW 1556-57 WM/YW 4237-38, 5871-72 (redacted)
PX-17	10/28	10/28	Complaint Wantou to Kendra Buford (4-26-16) as to harassment and disparate treatment by Katy Leevs	WM/YW 005870-71 (redacted) 5872-73)
PX-18	10/28	10/28	Wantou's Grievance (4-26-16) for Coaching of 4-25-16	WM/YW 4232 6492 5873
PX-19	11/04	11/04	Buford Forwarded E-mail (as to Wantou's 4-26-16 grievance as to coaching of 4-25-16	Wantou 5460-64

			and complaint as to harassment by Katy Leeves) to Griggs on 4-27-16	WM-YW 006488- 006492 (redacted)
PX-20	11/04	11/04	E-mail String Between Wantou and Shannon Griggs May 2016	WM/YW 005848-49
PX-21	10/28	10/28	Formal complaint disparate treatment, harassment and retaliation (6-29-16); and Addendum (6-30-16) to Formal complaint of 6-29-16	Wantou 64-67 WM/YW 4233-36
PX-22	11/04	11/04	E-mails Exchanges with to Shannon Griggs and Kendra Buford as to Formal Complaint of discrimination 6-29-16 to 6-30-16	Wantou 62-67 WM/YW 1563-66
PX-23	11/04	11/04	E-mail String between Wantou and Shannon Griggs June-July 2016	Wantou 062-63 WM/YW 7745- 50
PX-24	11/04	11/04	E-mail (7-8-16) exchanges between Wantou and Shannon Griggs re: Wantou wanting to discuss his complaints and grievances	(WM/YW 1594-96)
PX-25	10/28	10/28	E-mail (7-10-16) from Wantou to Shannon Griggs re: Alleged HIPAA breach	Wantou 70
PX-26	10/28	10/28	E-mail (7-29-16) from Wantou to Damon Johnson re: syringe incident and xenophobic insults	Wantou 75-76
PX-27	10/28	10/28	Written Ethics Line Complaint from Wantou; 8-14-16	WM/YW 461, 468
PX-28	10/28	10/28	E-mail (11-25-16) from Wantou to Kendra Buford re: complaint and termination grievance	Wantou 96-97 WM/YW 4230-38
PX-32	11/5	11/5	Ethics Line Case Detail as to 1-11-16 Ethics Complaint	WM/YW 397- 407
PX-33	11/5	11/5	Ethics Line Case Detail as to 1-14-16 Ethics Complaint	WM/YW 408- 411, 5885-

				5888, 6038-6041, 414-417
PX-34	11/5	11/5	Ethics Line Case Detail as to March 2016 Ethics Complaint	WM/YW 418-28
PX-35	11/5	11/5	Ethics Line Case Detail as to 4-21-16 Ethics Complaints	WM/YW 429-48 5827-5837 (redacted)
PX-36	11/5	11/5	Ethics Line Case Detail as to 4-22-16 Ethics Complaints	WM/YW 449-59
PX-37	11/5	11/5	Ethics Line Case Detail as to 8-14-16 Ethics Complaints	WM/YW 460-70, 1598-1603 5880-5884
PX-41	10/29	10/29	E-mail String and Records as to Ethics Line Complaint of 8-14-16	WM-YW 5877-88
PX-42	10/28	10/28	Wantou's E-mails as to Medication Errors	Wantou 052-59, 72-73
PX-44	10/29	10/29	Damon Johnson's Communication with Buford on 12-5-16 as to Wantou's Ethics Line Complaint of 8/14/16 (Damon Johnson Alleges Resolved Ethics Line Complaint)	WM-YW 004218
PX-45	10/29	10/29	Buford's Alleged Investigation Post-Termination(about 2-1-17)	WM-YW 004205-004296
PX-46	11/04	11/04	Katy Leeves' Signed Typed Notes 2-3-17	WM/YW 004266-69
PX-48	11/04	11/04	Katy Leeves' Signed Hand-Written Notes 2-1-17	WM/YW 004253-60
PX-52	11/5	11/5	Walmart Anti-Discrimination/Harassment Policy	WM/YW 000896-919
PX-55	11/5	11/5	-Walmart Requirements for Promotion to Management Positions (WM-YW 006978) - To Be Promoted: No Level II or Level III Coaching (WM/YW 6973-74)	WM-YW 006978 WM/YW 6973-74
PX-57	11/04	11/04	Misty Perez: Techs Sabotage	WM/YW 007709-11

PX-60	11/04	11/04	Leeves' E-mail to Jones (about) 8-21-16 as to Fluzone HD	WM-YW 000729-730
PX-61	10/28	10/28	E-mail exchange between Wantou and Leeves with attachments on 8-21-16 regarding Fluzone HD	Wantou 77-80 WM-YW 000670-675
PX-62	10/28	10/28	Text Message Exchanges, including: -Message to James Jones 9-12-16 (Board) et al. - Message Regarding Missing Pay	Wantou 81
PX-63	10/28	10/28	Leeves' E-mail to Jones 10-7-16 as to Fluzone HD	WM-YW 013147-13149
PX-65	10/28	10/28	E-mail Exchange between Wantou & James Jones on 10-19-16 regarding Vaccines (Exhibit SR-20: PTF's Sur-Reply as to MSJ))	WM-YW 006505
PX-66	11/04	11/04	Leadup to Termination E-mails	WM/YW 6590-91, 7536, 7541-42, 7653- 57
PX-67	10/28	10/28	Wantou's Interview 10-25-16	Wantou 94-95 WM/YW 005710-11 005705-09
PX-69	10/28	10/28	Wantou Termination Exit Interview	WM-YW 000262
PX-72	10/28	10/28	Texas Board of Pharmacy Rules 2016	
PX-73	10/28	10/28	Section 295.15 of Texas Administrative Code Immunizations	Wantou 005111- 18
PX-75	11/04	11/04	Alleged List of Vaccines Outside the Standing Order	WM-YW 011912 - 011935 WM-YW

				011938 - 011948 WM-YW 12664-12677
PX-78	10/28	10/28	Standing Order August 18, 2015 Standing Order August 9, 2016	WM-YW 004803-004809 WM-YW 006508-006514
PX-79	10/28	10/28	Consent Form	Wantou 5109-10
PX-80	11/04	11/04	Alleged Corporate Protocol for Vaccines 2015, Dated December 18, 2015	WM-YW 014401-420
PX-90	11/04	11/04	Terminations at Pharmacy of Store #131 from 1-1-15 to 8-1-17	WM-YW 008800
PX-94	10/29	10/29	List of Techs/Cashiers at Store #131 from 3- 1-15 to 1-1-17	WM-YW 008794
PX-98	11/04	11/04	POM 1102: Quality Improvement Responsibility	WM-YW 001663-1667
PX-101	10/29	10/29	Coaching Policy from 2012 to 2016	WM/YW 001021-22, 1026-28, 1032- 34
PX-102	10/28	10/28	POM 206: Professional Accountability Matrix Guidelines (Health & Wellness Compliance) (July 2016)	Wantou 140-143
PX-103	11/04	11/04	Health & Wellness Accountability Matrix (October 2014)	WM/YW 1756
PX-114	10/28	10/28	Mental Anguish Documents ¹ (Wellness Pointe and Genesis)	Wantou 1851- 1929 WM-YW 6199- 6201 6196-6198 6303-6356 6279-6286

¹ Continuously supplemented, in accordance with the Fed. R. Civ. P.

				6357-6359 6402-6405 6127-6142 6113-6125 6109-6111 6108 6105-6107 6102-6104 6099-6101 Wantou Med_Rec_WP_II _00001 to 87 Wantou Med_Rec_WP_II I_00001 to 55
PX-115	10/28	10/28	Wantou's Sedgwick Claim Leave of Absence June 2016 (Claim entered 8-16-16)	WM/YW 002302-91
PX-116	10/28	10/28	Wantou's Leave of Absence Data/Sedgwick: June-July 2016	WM/YW 00263
PX-117	10/28	10/28	Plaintiff's Offer Letter, 3-17-15	Wantou 001-003
PX-124	10/28	10/28	Job Search ²	Wantou 189-1824 Wantou IND 01-17_06-1-32 JS 01-18 1-100 JS 02-18 1-41 JS 03-18 1-42 JS 04-2018 1-27 JS 05-2018 1-33 JS 06-2018 1-40 JS 07-2018 1-30 JS 08-2018 1-34 JS 09-2018 1-72 JS 10-2018 1-80 JS 11-2018 1-89 JS 12-2018 1-56 ZR 01-18_07-19 1-105 JS 08-19_09-19_10-19 000001-199

² Continuously supplemented, in accordance with the Fed. R. Civ. P.

				Wantou JS 02-19 1-164 JS 03-19 1-290 JS 04-19 1-180 JS 05-19 1-289 JS 06-19 1-502 JS 07-19 1-384
PX-126	10/28	10/28	Alleged First Written Coaching with Time Details 3-16-16	WM-YW 004283-84
PX-127	10/28	10/28	Records of Visuals on 3-16-16	WM/YW 014377-86
PX-128	10/28	10/28	Records of 4-Points on 3-16-16	WM/YW 014387-97
PX-132	10/28	10/28	Coaching of 4-25-16 with Time Details	WM-YW 004285-86
PX-133	11/04	11/04	Coaching of 6-28-16 with Time Details	WM-YW 004287-89
PX-135	11/04	11/04	Leeves on Wantou's Work 6-16-16 (Alleging Wantou "Hardly did work")	WM-YW 000590—605 WM/YW 000590, 594, 597, 601, 605)
PX-137	11/04	11/04	Leeves' Typed notes on Uduma 6-28-16	WM-YW 004279
PX-143	10/28	10/28	Plaintiff's Performance Evaluation 3-31-2016 Plaintiff's Mid Year Discussions Evalaluation (from Katy Leeves) 9-8-16	Wantou 82-86 WM/YW 000234-37
PX-144	11/5	11/5	Steven Williams About Plaintiff's Work	WM/YW 000385 WM/YW 000368
PX-192	10/28	10/28	E-mail from Wantou to James Jones about Missing Pay Forwarded to Kendra Buford on 12/9/16	WM-YW 005702